

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division**

TYRONE HENDERSON, *et al.*

Plaintiffs,

v.

Civil Action No. 3:12cv97 (REP)

CORELOGIC NATIONAL BACKGROUND DATA, LLC

Defendant.

**DEFENDANT'S CONSENT MOTION FOR
AN EXTENSION OF TIME TO FILE OPPOSITION BRIEF**

Defendant, CoreLogic National Background Data, LLC ("NBD"), by counsel, pursuant to Fed. R. Civ. P. 6(b)(1) and Local Civil Rule 7(F)(2)(b), files this Consent Motion for an Extension of Time within which to file its memorandum in opposition to Plaintiffs' Motion for Class Certification (Dkt No. 70). In support of its Motion, NBD states as follows:

1. On October 1, 2013, this Court entered an Order establishing a briefing schedule for any Motions for Summary Judgment and Plaintiffs' Motion for Class Certification. (Dkt. No. 56.) Under that Order, all such motions were due by December 18, 2013, with opposition briefs due by January 24, 2013, and any reply briefs due by February 14, 2014. *See id.*

2. On December 18, 2013, Plaintiffs moved to extend the time for the filing of any Motion for Class Certification and/or Motion for Summary Judgment until December 23, 2013. (Dkt. No. 58.) NBD did not oppose Plaintiffs' request. The Court granted the Plaintiffs' requested extension. (Dkt. No. 60.)

3. On December 22, 2013, Plaintiffs requested an additional extension of time until January 3, 2013 to file any Motions for Summary Judgment and their Motion for Class

Certification. (Dkt. No. 61.) NBD did not oppose that request. The Court granted Plaintiffs' additional requested extension. (Dkt. Mo. 63.)

4. NBD now moves for an extension of time to file its opposition to Plaintiffs' Motion for Class Certification, which will cause NBD's brief to be due by February 10, 2014. NBD also moves for an extension of time for Plaintiffs to file their opposition brief to NBD's Motion for Summary Judgment. NBD further moves to set new deadlines for the filing of any reply briefs to either motion, which will be due on February 28, 2014.

5. Under the proposed extended schedule, the deadlines for the parties to file their opposition briefs to the pending motions is extended until February 10, 2014, and the deadline to file any reply briefs in support of the pending motions is extended until February 28, 2014.

6. NBD's counsel has communicated with counsel for Plaintiffs, who are agreeable to the requested extensions. This extension request is made prior to the expiration of NBD's filing deadline. This reciprocal request for an extension of time is made in good faith and not for any dilatory purpose. The requested extension will not affect any additional deadlines in the case, including because no trial date has been scheduled. A proposed Agreed Order is being circulated for endorsement by counsel for the parties, a copy of which is attached hereto.

WHEREFORE, Defendant, National Background Data, LLC, hereby requests that the Court: (1) grant the Consent Motion for an Extension of Time; (2) enter the Agreed Order attached hereto; and (3) award it such further relief as the Court deems appropriate.

**CORELOGIC NATIONAL BACKGROUND
DATA, LLC f/k/a NATIONAL BACKGROUND
DATA, LLC**

By: /s/ Timothy J. St. George
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CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of January 2014, I filed a true and correct copy of the foregoing on the Court's Electronic Case Filing system, which will sent a notice of electronic filing to:

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